

United States District Court
Western District of Texas
San Antonio Division

C.M. on his own behalf and on behalf of his
minor child, D.V.,

Plaintiffs,

v.

United States of America,

Defendant.

Case No. SA-21-CV-00234-JKP-ESC

JOINT MOTION TO STAY PROCEEDINGS

Plaintiffs, by and through undersigned counsel, and Defendant, by and through the United States Attorney for the Western District of Texas and the undersigned Assistant United States Attorney, hereby respectfully request a stay of proceedings in this case, and in support thereof would respectfully show as follows:

1. Plaintiffs' Complaint was filed on March 8, 2021.
2. Defendant's deadline to file a responsive pleading is Friday, May 28, 2021.
3. The parties have agreed to a 60-day stay of this matter so that the parties may facilitate the resolution of this matter.
4. Therefore, the parties respectfully request a 60-day stay and extension of Defendant's deadline to file responsive deadline, as set forth in the proposed order submitted herewith.
5. This stay is not sought for purpose of delay but to facilitate the resolution of this matter.

WHEREFORE, the parties respectfully request that the Court stay the proceedings in this case for 60-days and extend Defendant's deadline to file a responsive pleading until July 27, 2021.

Respectfully submitted,

Ashley C. Hoff
United States Attorney

By: /s/ Faith Johnson Lowry

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Certificate of Service

I certify that on May 18, 2021, a true and correct copy of the foregoing Joint Motion to Stay Proceedings was electronically filed via the Court's CM/ECF system which will send notice to the following:

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